

Message

From: Robinson, Jeffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5C2955A5BAB44049BAA34B80783864EF-ROBINSON, JEFFREY]
Sent: 10/29/2018 9:37:31 PM
To: Lassiter, Penny [Lassiter.Penny@epa.gov]
Subject: RE: RSR Extensions

Thanks.

From: Lassiter, Penny
Sent: Monday, October 29, 2018 4:24 PM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Subject: RE: RSR Extensions

Jeff,

Below, please find an excerpt of a summary sent to OMB to request a review waiver. Please do not disseminate as we do not yet have management concurrence on this compliance extension. Thanks.

Description of the Action: This action, if finalized, would amend the compliance date for maintenance vents located at sources subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Refinery MACT 1 regulations, which were published in the Federal Register on December 1, 2015, and subsequently amended on July 13, 2016. Specifically, EPA is contemplating finalizing an amendment to the compliance date for maintenance vents located at refineries from August 1, 2017, to January 30, 2019. This action would provide petroleum refinery owners and operators with an additional 18 months to achieve compliance for these provisions. The January 30, 2019, compliance date in this final action would be 3 years from the effective date of the December 1, 2015, final rule (*i.e.*, February 1, 2016). This is consistent with Clean Air Act section 112(i)(3)(A), which specifies that EPA provide a compliance date no more than 3 years after the effective date of the standard. These revisions do not affect requirements that apply during normal operations and will have an insignificant effect on emissions reductions and no effect on costs.

Background: On December 1, 2015, EPA finalized amendments to Refinery MACT 1 and Refinery MACT 2 based on the risk and technology review (RTR). The December 1, 2015, final amendments included requirements in Refinery MACT 1 for process vents designated as "maintenance vents" and required immediate compliance for these requirements. Maintenance vents are only needed during startup, shutdown, maintenance or inspection of equipment where the equipment is emptied, depressurized, degassed or placed into service.

On July 13, 2016, in response to petitions for reconsideration, EPA finalized an extended compliance date for these provisions to August 1, 2017, in order to provide more time for refiners to complete their process of revising procedures to comply with these requirements. Additionally, most refiners sought and were granted 1-year extensions to comply with these provisions until August 1, 2018, under the compliance extension procedure in 40 CFR 63.6(i). During this period, EPA also received requests for clarification of the final rule amendments and proposed technical amendments on April 10, 2018. On July 10, 2018, EPA proposed to amend the compliance date to January 30, 2019, as petroleum refiners expressed challenges complying with the final rule requirements and proposed amendments despite the additional compliance time provided in the July 13, 2016, final rule (*i.e.*, August 1, 2017) or via compliance extensions to August 1, 2018.

From: Robinson, Jeffrey
Sent: Monday, October 29, 2018 1:38 PM
To: Lassiter, Penny <Lassiter.Penny@epa.gov>
Subject: RE: RSR Extensions

Penny,

Do you have a one-pager or paragraph you've used to keep your management updated on the work you're doing for this prospective extension?. My RA asked since she frequently meets with industry (refiners) and petrochemical operations.

Jeff

From: Robinson, Jeffrey
Sent: Monday, October 29, 2018 7:36 AM
To: Wilson, Aimee <Wilson.Aimee@epa.gov>
Subject: FW: RSR Extensions

From: Lassiter, Penny
Sent: Friday, October 26, 2018 4:34 PM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Subject: FW: RSR Extensions

From: Lassiter, Penny
Sent: Friday, October 26, 2018 5:30 PM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Subject: RE: RSR Extensions

Jeff,

Somehow, I hit the "send" button before I had finished my email, so disregard the previous email. Below are the refineries in Reg. 6 that we believe received 1-year compliance extensions (from August 2017 to August 2018) for the maintenance vent provisions in the 2/1/2016 Petroleum Refinery Sector Rule. If Region 6 has any of the letters that the states issued and any of the incoming requests from the companies (which may have been appended to the states' response letters), we would really appreciate receiving copies of those. If you could pass this request on to your colleagues in Region 6 who may be in possession of any such letters, we would appreciate it. Again, these would have been issued by the states in 2017 granting 1-year extensions to refiners in order to install controls to comply with the maintenance vent provisions in the 2016 Refinery Sector Rule. Thanks.

CVR Energies Wynnewood, OK

Andeaver El Paso, TX

Flint Hills Resources – Corpus Christi East and West, TX
LyondellBasell Houston, TX

Phillips 66: Alliance Refinery Belle Chase, LA; Borger Refinery Borger, TX; Lake Charles, LA;
Ponca City Refinery Ponca City, OK; Sweeny Refinery Old Ocean, TX

PBF Energy Chalmette, LA

Marathon: El Paso, TX; Gallup, NM; Galveston Bay Refinery Texas City, TX; Garyville, LA

ExxonMobil: Baytown, TX; Beaumont TX; Baton Rouge, LA

Valero: Ardmore OK; Bill Greehey Refineries Corpus Christi, TX; Houston, TX; McKee Refinery
Sunray, TX; Meraux Refinery Chalmette, LA; Port Arthur, TX; St. Charles, LA; Texas City, TX;
Three Rivers, TX

From: Robinson, Jeffrey
Sent: Friday, October 26, 2018 10:56 AM
To: Lassiter, Penny <Lassiter.Penny@epa.gov>
Subject: FW: RSR Extensions

Here is an example from LDEQ, but they indicated their letters were tailored form letters to each company. Still waiting to talk to Texas.....have a call into them. I'll get back with you later.

From: Bryan Johnston <Bryan.Johnston@LA.GOV>
Sent: Friday, October 26, 2018 9:47 AM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Subject: RSR Extensions

Here is an example. If you need more, just let me know.

Thanks,
BDJ